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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

**STATE OF CALIFORNIA,**

Plaintiff,

**v.**

**AZUMA CORPORATION, et al.,**

Defendants.

2:23-cv-00743-KJM-DB

**STIPULATION OF THE PARTIES TO  
EXTEND THE BRIEFING SCHEDULE  
FOR PLAINTIFF'S MOTION FOR  
O.S.C.; ORDER**

(L.R. 143, 144)

Action filed: April 19, 2023

Trial date: none

Hearing date: Jan. 26, 2024

Time: 10:00 a.m.

Courtroom: 3, 15th Floor

Judge: Hon. Kimberly J. Mueller

The parties, through their undersigned attorneys, hereby stipulate as follows:

1. On December 13, 2023, Plaintiff State of California ex rel. Rob Bonta, in his official capacity as Attorney General of the State of California ("State") filed a motion for an order to show cause why Defendant Darren Rose should not be held in civil contempt, ECF No. 50 ("Motion").

2. Based on Local Rule 230(c) and (d), the opposition to the Motion is currently due December 27, 2023, and the reply is due January 8, 2024. The hearing of the Motion is scheduled for January 26, 2024.

3. The Christmas holiday limits Defendants' counsel's availability to prepare Defendants' opposition brief, as members of Defendants' legal team and staff will be travelling out of town on and around Christmas Day and the brief's due date, December 27.

4. In addition, the parties are engaged in negotiations for settlement of this case with the assistance of the Mediation Program of the Ninth Circuit Court of Appeals and mediator Kay Suk. The parties have identified an exemplar agreement on which they can potentially base the settlement agreement in this case, and Defendants and their counsel are working to provide information requested by the State and to provide proposed terms of settlement in writing. The proposed extension of time would allow Defendants' counsel to continue to devote available time to these negotiations.

5. Neither party has previously sought or received an extension of time in connection with this Motion.

6. The proposed extension of the briefing schedule will not impact the scheduled hearing date of the motion, which would remain set for January 26, 2024.

7. Defendants contend that pursuant to Rules 6(b) of the Federal Rules of Civil Procedure and paragraph 8(B) of the Court's Standing Order, ECF No. 4-1, there is good cause to extend the briefing deadlines in this matter as set forth herein.

8. Accordingly, the parties hereby stipulate to the following briefing schedule:

**Opposition due: Friday, January 5, 2024**

**Reply due: Tuesday, January 16, 2024**

9. The parties request the Court to enter an order approving the terms of this stipulation.

1 Dated: December 20, 2023

Respectfully submitted,

2 PEEBLES KIDDER BERGIN AND  
3 ROBINSON LLP

4 /s/  
5 Gregory M. Narvaez  
6 *Attorneys for Defendants*

7 Dated: December 20, 2023

Respectfully submitted,

8 Rob Bonta  
9 Attorney General of California  
10 James V. Hart  
11 Supervising Deputy Attorney General

Peter F. Nascenzi  
Deputy Attorney General

12 /s/ (as authorized Dec. 20, 2023)  
13 David C. Goodwin  
14 Deputy Attorney General  
15 *Attorneys for Plaintiff*

**ORDER**

Having read the foregoing stipulation of the parties and good cause appearing therefore,

IT IS HEREBY ORDERED that the above stipulation of the parties is approved.

IT IS HEREBY ORDERED the schedule for briefing of Plaintiff State of California's Motion for an Order to Show Cause, ECF No. 50, shall be as follows:

**Opposition due: Friday, January 5, 2024**

**Reply due: Tuesday, January 16, 2024**

Dated: December 26, 2023.

  
CHIEF UNITED STATES DISTRICT JUDGE